

CHU.24544

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
LUBBOCK DIVISION

KAREN DI PIAZZA, Individually and as Mother  
to CORBIN JAEGER and as Personal  
Representative of the Estate of CORBIN LEE  
JAEGER, Deceased,  
Plaintiff,

VS.

WEATHER GROUP TELEVISION, LLC dba  
THE WEATHER CHANNEL, a  
Georgia limited liability company;  
WEATHER GROUP, LLC, a Delaware  
limited liability company;  
SHEENA BITTLE as Personal  
Representative of the Estate of KELLEY  
GENE WILLIAMSON; KEITH DANIELS as  
Personal Representative of the Estate of  
RANDALL D. YARNALL,  
Defendants.

CIVIL ACTION NO.  
5:19-cv-00060-C

**DEFENDANT WEATHER GROUP TELEVISION, LLC'S  
NOTICE OF DEPOSITION OF DR. THOMAS PARSONS, MD**

**TO:** Mr. Robert A. Ball and Mr. John M. Donnelly, LAW OFFICES OF ROBERT A. BALL, 225 Broadway, Suite 2220, San Diego, California 92101 and Mr. Benjamin H. Davidson, II and Ms. Mary Kathleen Davidson, MCCLESKEY HARRIGER BRAZILL & GRAF LLP, 5010 University Avenue, Suite 500, Lubbock, Texas 79413.

Mr. Robert B. Wagstaff, McMAHON SUROVIK SUTTLE, P.C., P. O. Box 3679, Abilene, Texas 79604.

Mr. Mark W. McBrayer, CRENSHAW, DUPREE & MILAM, L.L.P., 4411 98th Street, Suite 400, Lubbock, Texas 79464.

Pursuant to Rule 30 of the FEDERAL RULES OF CIVIL PROCEDURE, Defendant **WEATHER GROUP TELEVISION, LLC** will take the oral deposition of Dr. Thomas Parsons, MD (whose address is South Plains Forensic Pathology, P.A., 202 Avenue Q, Lubbock, Texas 79415) on **Tuesday, November 10, 2020 at 1:30 p.m. CST**. The deposition will take place at Caprock Reporting, 1112 Texas Avenue, Suite 200, Lubbock, Texas 79401. The witness is also instructed to bring with him the items on the attached Exhibit "A."

The deposition will be recorded both stenographically and by audiovisual means before an officer authorized to administer oaths.

Respectfully submitted,

*/s/ Richard G. Miller*

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& SALINAS, L.L.P**

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**ATTORNEYS FOR DEFENDANT WEATHER  
GROUP TELEVISION, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing instrument was served upon all counsel of record by ECF filing in accordance with the Federal Rules of Civil Procedure on the 14<sup>th</sup> day of October 2020.

*/s/ Richard G. Miller*

**RICHARD G. MILLER**

**EXHIBIT "A"**

Defendant Weather Group Television, LLC requests the production of any and all tangible and electronic records of **SOUTH PLAINS FORENSIC PATHOLOGY, P.A.** pertaining to **Corbin Lee Jaeger**, without limitation, including, but not limited to, all records related to:

Any and all records, including but not limited to, medical examiner's notes/reports, any medical records, investigator's notes/reports, drawings, diagrams, log sheets, call sheets, provisional autopsy form, lab values, toxicology screens/reports, toxicology measurements, death certificate, x-ray reports, imaging reports, correspondence, autopsy report, time and cause of death, findings and conclusions, written reports, letters, emails, fax transmissions, requests, authorizations, billing records, expense records, telephone messages and notes, and anything else reduced to writing and any other documents in the possession, custody, or control of **South Plains Forensic Pathology, P.A.** pertaining to Corbin Lee Jaeger, date of death March 28, 2017.

The above requests extend to and include request for all data and information which exist in electronic form, and are not limited to documents created by **South Plains Forensic Pathology, P.A.** The electronic, magnetic, and digital data for any requested materials shall be produced in printed form. However, this subpoena does **not** request production of microscopic slides, tissue or other samples, x-rays, photographs, or videos.